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October 1, 2020

## By ECF

Hon. Debra Freeman U.S. District Court for the Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312

> Re: Jane Doe 15 v. Indyke et al., 19-cv-10653 (PAE)(DCF) Mary Doe v. Indyke et al., 19-cv-10758 (PAE)(DCF) Davies v. Indyke et al., 19-cv-10788 (GHW)(DCF)

Your Honor:

We represent the plaintiffs in the three above-referenced cases. As directed in Your Honor's Order dated September 4, 2020, we write jointly with counsel for Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (the "<u>Co-Executors</u>"), to provide a status update.

These cases were stayed on June 22, 2020 pending the plaintiffs in each of these cases attempting to resolve their claims against the Co-Executors through the Epstein Victims Compensation Program. The plaintiffs in all three cases have registered their claims with the administrators of the Program and expect soon to submit their complete claims and supporting documents to the administrators. The parties remain hopeful that all claims in these matters will be resolved through the Program. Accordingly, all parties believe that these cases should remain stayed at this time. We will notify the Court once the Program has progressed further such that either the claims are resolved or the stays should be lifted.

We appreciate Your Honor's attention to these matters.

Very truly yours,

/s/ Mariann Meier Wang

Mariann Meier Wang

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 $\operatorname{cc:}$  Counsel for Defendants, by  $\operatorname{ECF}$